

REMARKS

The Office Action mailed July 16, 2007 considered claims 1-11 and 14-23. Claims 1-11, 21 and 23 were rejected under 35 U.S.C. 102(b) as being anticipated by Parker et al. (5,600,789) hereinafter *Parker*. Claims 14-20 and 22 were rejected under 35 U.S.C. 103(a) as being unpatentable over Cordero et al. (US 2001/0044,339) hereinafter *Cordero* in view of *Parker*.¹

By this paper, 1, 2, 4, 14, 21 and 22 have been amended and no claims have been added. As such, claims 1-11 and 14-23 remain pending in the application, of which only claims 1, 14, 21, and 22 are independent claims.

As a preliminary matter, Applicants would like to thank the Examiner for the courtesies extended during the telephonic interview held October 10, 2007. Details of that interview are included herein below.

The application is generally directed to allowing for efficient testing of different interfaces intended to be used with an application program. In claims 1 and 21 this is accomplished by identifying an application program interface (API) that is common to each of the interfaces and performing testing on the common API as a representative test for all of the interfaces. A representation of a first value is provided to the application program through the common API. If an expected result is returned, a determination can be made that all of the different interfaces are interoperable with the application program. Claim 1 recites a method and claim 21 recites a corresponding computer program product for performing the method of claim 1.

Similarly, claims 14 and 22 allow for efficient testing of different interfaces by sending a value for each of the different interfaces using a common API. Results are received as a result, and these results are compared to identify an expected result.

Claim Rejections Under 35 USC 102

¹ Although the prior art status of the cited art is not being challenged at this time, Applicant reserves the right to challenge the prior art status of the cited art at any appropriate time, should it arise. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status of the cited art.

The Office Action rejected claims 1 and 21 under 35 USC 102 as being anticipated by *Parker*. Applicant respectfully traverses the rejection. In particular, the Office Action asserts that *Parker* teaches "identifying one or more interfaces that are intended to access an application program," and "identifying an application programming interface that is common to each of the one or more interfaces that can access the application program...." See Office Action at pages 2-3. The Office Action cites to *Parker* at Figure 15 including elements 808, 810 and 814, and Figure 15, elements 802 and column 17, line 23. However, the cited portions of *Parker*, when read in conjunction with other portions of *Parker*, appear to teach something quite different than what is being recited by the claims of the present application. In particular, *Parker* does not appear to teach "identifying a plurality of interfaces that are intended to access an identified application program" or "identifying an application program interface that is common to each of the plurality of interfaces that can access the application program...." Illustratively, the description of Figure 15 specifically teaches a system directly contrary to the system claimed in the present application. *Parker* teaches:

The test script of the present invention can run on the same or on a different machine than the test driver or drivers being used at any one time as depicted in FIG. 15. In FIG. 15, the test script, 800, and the test executive, 802, both reside on Machine 1, 820. Also resident on machine 1, 820, are test drivers 1 and 2 (804 and 806) and two different applications running under two different GUIs (808 and 810).

Parker at col. 33, lines 42-48 (Emphasis added to facilitate identification).

This is in direct conflict with what is recited by claims 1 and 21 of the present application which recite "identifying an application program interface that is common to each of the plurality interfaces that can access the application program...." Thus, the claims of the present application recite different interfaces using a common API to access a single application program. In stark and direct contrast, while *Parker* does teach a number of GUIs, *Parker* does not teach that the GUIs use a common API and in fact teaches that each of the GUIs is used for a completely different and separate application, which each presumable have their own different API that the separate GUIs are programmed to. Thus, not only does *Parker* not teach what is recited by the claims of the present application, *Parker* teaches a system that is at direct odds with what is claimed in the present application.

Claim Rejections Under 35 USC 103

The Office Action rejected claims 14 and 22 as being unpatentable over *Cordero* in view of *Parker*. However, applicant traverses this rejection as well. Specifically, claims 14 and 22 are directed to "testing an application program through each of the plurality of interfaces using a single testing program....." This is accomplished by sending values through interfaces having a common API, receiving results corresponding to each of the interfaces, and comparing the results with each other to identify an expected result. While *Cordero* does teach at [0075] that a common API may be presented for all platforms, it appears that this API is used during development of platforms and is not used for sending values for different interfaces such that results and later results can be compared. Rather, *Cordero* simply illustrates that a programmer can program to a cross platform core to simplify programming, rather than testing. See *Cordero* at [0013]. At page 7 of the Office Action, the Office Action appears to admit that *Cordero* does not disclose comparing to identify an expected result.

The Office Action then cites to *Parker* for showing the comparison. However, the comparison taught by the cited portions of *Parker* seems to apply to a single test interface testing a single application. Specifically, the Office action cites to col. 11, line 57 through col. 12, line 31. This portion of *Parker* refers to Figure 4. See *Parker* at col. 10, line 1. Figure 4 illustrates an application 300, a test tool including a test driver 320 connected to a GUI 307. The cited portions of *Parker* teach that the test driver 320 can simulate input events to the GUI. See col. 12, lines 4-5. *Parker* further teaches that the test driver 320 will, if possible, wait to verify that an event such as a click, did in fact, cause a specific control to receive the event. See col. 12, lines 29-31. Thus, it appears that the cited portions of *Parker*, insofar as they teach any comparison whatsoever, appear to teach a single GUI input being used to verify that an application responds as expected based on the input.

This is different that what is recited by the claims of the present application. In particular the claims of the present application recite comparing a plurality of results (where each result in the plurality corresponds to an identified one of the plurality of interfaces) with each other to identify an expected result. While *Parker* appears to teach a single interface (GUI) and testing to the single interface by verifying that an expected event occurred, rather than identifying an expected result, the claims of the present application recite comparisons with each other among multiple results corresponding to multiple interfaces. Further, as explained in the arguments for claims 1 and 21, insofar as *Parker* teaches multiple interfaces, each of those interfaces

corresponds to each its own application rather than a single application. See *Parker* at col. 33, lines 47-48 "two different applications running under two different GUIs...."

While not necessary, Applicant would like to further argue the patentability of previously presented dependent claim 23. Dependent claim 23 recites "The method of claim 1, wherein providing at least one representation of a first value to the application program through the common application program interface comprises testing various isomorphisms of a value such that different forms of one or more values may be tested." This claim was rejected in view of *Parker* at col. 6, Table 1. However, Table 1 appears to be directed to something quite different. In particular, Table 1 appears to be directed to GUI superclass objects and their names in various GUIs. In stark and direct contrast, claim 23 is directed to isomorphisms. Examples of isomorphisms are illustrated in Applicant's disclosure at [0032]. Specifically, isomorphisms are generally one or more variations on the same or similar value. The example illustrated is that December 19 can be represented by December 19, 12/19, 19-12, 12-19, etc. Thus, claim 23 focuses on different representations for values interfaces as opposed to the different names that are given to similar GUI elements in different platforms as is illustrated by Figure 6 of *Parker*.

In view of the foregoing, Applicant respectfully submits that the other rejections to the claims are now moot and do not, therefore, need to be addressed individually at this time. It will be appreciated, however, that this should not be construed as Applicant acquiescing to any of the purported teachings or assertions made in the last action regarding the cited art or the pending application, including any official notice. Instead, Applicant reserves the right to challenge any of the purported teachings or assertions made in the last action at any appropriate time in the future, should the need arise. Furthermore, to the extent that the Examiner has relied on any Official Notice, explicitly or implicitly, Applicant specifically requests that the Examiner provide references supporting the teachings officially noticed, as well as the required motivation or suggestion to combine the relied upon notice with the other art of record.

In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney at 801-533-9800.

Dated this 16th day of October, 2007.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rick D. Nydegger", is written over the typed name.

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